

## **7 – 1 Summary of Clean Harbors Grassy Mountain hazardous waste landfill oversight by the Division of Solid and Hazardous Waste**

### **Oversight Staff**

The Commercial / Federal Facilities Section of the Division of Solid and Hazardous Waste is responsible for the oversight of the compliance and permitting of the Clean Harbors Grassy Mountain hazardous waste landfill. Two environmental scientists and one engineer are assigned to conduct these activities. A fourth staff member reviews and tracks the financial assurance issues at the facility.

### **Routine Facility Inspection Program**

On-site inspections of the facility are usually conducted monthly. These inspections focus on different segments of the operation of the facility. These may include inspections of the waste receiving and waste analysis procedures, waste tracking, proper handling of the wastes, security, personnel training, response to contingencies, proper operation of the landfill, surface impoundment, review of closure cost estimates, and groundwater monitoring systems.

### **Special Investigation Activities**

Investigations are also conducted based on complaints or allegations and self-reported non-compliance.

### **Enforcement Activities**

Following each inspection, a Notice of Inspection is left with the facility outlining observations, issues, and concerns noted during the inspection. This provides the facility with a way to quickly respond to potential enforcement concerns. As a result of information gathered during inspections, enforcement documents such as Warning Letters, Notices of Violation, and Compliance Orders are issued to Grassy Mountain. In addition, preparation of a written response outlining the corrective actions is required to be submitted by the facility. Proposed civil penalties are calculated based on the Board's Penalty Policy. Final civil penalties are negotiated with the facility. A Stipulation and Consent Order is prepared to resolve the enforcement action. These are subject to public review and are then approved by the Utah Solid and Hazardous Waste Control Board.

### **Other Facility Inspection Activities**

A significant portion of the inspections at the facility deals with the operation of the landfill and treatment activities. In addition to biannual ground water sampling and analysis evaluation, Division staff conducts a comprehensive ground water evaluation every three years to ensure that the groundwater monitoring system is performing as designed and that we maintain an appropriate understanding of the hydrogeology of the site. The Division staff monitors hazardous waste cell construction and closure procedures and the associated quality control and quality assurance reviews.

As part of federal authorization for the hazardous waste program, federal EPA regional staff conducts oversight inspections with the state, usually annually. Additionally, EPA is required to conduct an annual on-site inspection of Grassy Mountain for the federal

Off-Site Policy to ensure that Superfund waste is being handled acceptably. Division staff participates in these inspections.

#### Permitting Program

Grassy Mountain submits requests for modifications to its permit on a regular basis. These requests are reviewed for technical adequacy and compliance with applicable regulations. Class 2 and 3 modifications include public participation. Class 1 modifications are designed to be of a more minor nature and may be approved by the Executive Secretary without public participation. Any permitting action may be appealed to the Utah Solid and Hazardous Waste Control Board. Permits are issued for a term of ten years but are subject to a five-year review. They can be modified at any time if necessary.

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